

CEQA Findings of Fact

Final Housing Plan Program Environmental Impact Report

SCH No. 2022040209

1.0 Introduction and Legal Authority

These Findings of Fact are made pursuant to the California Environmental Quality Act (CEQA), Public Resources Code (PRC) Section 21000 et seq. and California Code of Regulations, Title 14, Section 15000 et seq. by the City of Santa Barbara (City) as the lead agency for the Final Housing Plan Program Environmental Impact Report (Final EIR) State Clearing House Number (SCH) 2024100348. Findings are based upon the entire administrative record, including the Draft EIR, Final EIR, technical appendices, comments received during the public review period, written responses to comments, staff reports, and all other information contained in the record of proceedings.

1.1 Project Description Summary

The project evaluated in the Final EIR is the City of Santa Barbara Housing Plan, described in Section 3.0, *Project Description* of the Final EIR. The Housing Plan consists of programs included in the 6th Cycle Housing Element and associated amendments to the Municipal Code, General Plan, and/or Local Coastal Program to maintain consistency with the Housing Element and State law. The Housing Plan provides the framework for meeting state housing requirements and accommodating the City's Regional Housing Needs Allocation (RHNA) of 8,001 units. The Housing Plan includes existing, ongoing, and future programs including but not limited to the following:

- HE-1 (Adaptive Reuse): Develop and adopt an adaptive reuse ordinance and prepare outreach materials, forms, and applications.
- HE-2 (La Cumbre Plaza Planning Area): Prepare and adopt a planning document for the La Cumbre Plaza site to facilitate full residential development.
- HE-4 (Use-By-Right Permitting): Ensure sites identified for housing in the 4th (vacant) and 5th (vacant and nonvacant) cycles allow use-by-right approval when 20 percent or more of the units are affordable to very low- and low-income households.
- HE-5 (Process Improvements): Implement some of the process improvements identified in the Novak Report and Government Constraints Analysis in phases: Phase 1 for single unit residential; Phase 2 for multi-unit and mixed-use residential.
- HE-7 (Objective Design and Development Standards): Adopt a new Title in the Municipal Code to implement Objective Design and Development Standards for multi-unit and mixed-use residential and amend the zoning ordinance to outline objective design review process and findings.

- HE-8 (Innovative Housing Types): Conduct outreach and update the zoning ordinance to facilitate more innovative housing types.
- HE-9 (Resource Protection and Development Certainty): Adopt Municipal Code amendments and Master Environment Assessment procedures to protect resources and streamline development approval.
- HE-10 (Multi-unit Housing Program): Amend the Average Unit-Size Density (AUD) Incentive Program ordinance to further facilitate multi-unit housing.
- HE-11 (Livable Neighborhoods): Promote and preserve Rental Housing Mediation Program, complete the State Street Master Plan, complete pedestrian and bikeway projects in underserved locations, support CDBG funding for projects in low- and moderate-income areas, and facilitate electrification of housing stock. Target 1-2 improvements per year.
- HE-12 (Prioritize Deed-Restricted Affordable Housing): Conduct a feasibility study, develop strategies, and amend the zoning ordinance to increase deed-restricted units, incentivize affordable housing on small sites and promote consolidation of small lots, consider local preference policy, and implement water and sewer preference policy.
- HE-13 (Inclusionary Housing Ordinance): Conduct a feasibility study and update the inclusionary housing ordinances per the results of the study.
- HE-14 (City Land Registry): Evaluate all City-owned land for affordable housing potential and prioritize city-owned sites for housing.
- HE-20 (Evaluate Hotel Zones): Monitor hotel development trends, review zones that allow both hotels and residential use, and amend the zoning ordinance to prioritize residential development over hotels in targeted areas. Study fractional ownership trends and amend the zoning ordinance if necessary to protect long term housing stock.

1.2 Procedural Compliance with CEQA

The City of Santa Barbara complied with all CEQA procedural requirements for preparation, circulation, noticing, and consideration of impacts, for the Housing Plan Program EIR.

A 30-day scoping process commenced with the issuance of the Notice of Preparation (NOP) of a Draft EIR on April 11, 2022. The NOP was filed with the State Clearinghouse and Santa Barbara County Clerk on April 11, 2022 and was distributed to responsible and trustee agencies, and potentially interested parties previously requesting notice in writing (CEQA Guidelines Section 15082; Public Resources Code Section 21092.2). The City received seven written responses to the NOP including two responses from state and local agencies and five responses from public commenters. The City noticed and held a public scoping meeting on April 21, 2022 at 1:00 PM at Santa Barbara City Hall, City Council Chambers during the City of Santa Barbara Planning Commission hearing. During which, the City received verbal comments from two individuals and the Planning Commission. The NOP, NOP comments, and NOP comment responses are included in Appendix A of the Final EIR.

The Draft Housing Plan Program EIR was published on January 30, 2026, and a Notice of Completion was filed with the State Clearinghouse on the same date, initiating a 45-day public review period. The Notice of Availability was distributed to responsible and trustee agencies, interested parties, and members of the public, and was published in a local newspaper of general circulation. The Draft EIR was made available for public review electronically on the City's website and in hard copy at the City's Planning Counter and the Santa Barbara Public Library. During the public review period, a noticed public hearing was held before the Planning Commission on March 12, 2026 at 1:00 PM at Santa Barbara City Hall, City Council Chambers, to receive public comment on the Draft EIR. During the public review period, the City received five comment letters on the Draft EIR, in addition to verbal comments made by one individual and the Planning Commission during the Draft EIR public hearing.

Following the close of the public review period, the City prepared written responses to all substantive environmental comments received on the Draft EIR in accordance with CEQA Guidelines section 15088. The responses to comments, together with revisions and clarifications to the Draft EIR, are contained in the Final EIR.

1.3 Location and Custodian of the Administrative Record

Pursuant to Public Resources Code Section 21167.6(e), the documents and other materials that constitute the record of proceedings forming the basis of the CEQA Findings of Fact are located at 630 Garden Street, Santa Barbara, California 93101. The custodian of these documents is the Community Development Department. The Administrative Record includes, but is not limited to, the following:

1. The Notice of Preparation (NOP), scoping comments, and all materials prepared in connection with the environmental scoping process.
2. The Draft Housing Plan Program EIR, including all technical appendices, figures, maps, tables, and supporting studies.
3. The Notice of Completion, Notice of Availability, proof of publication, public notices, and all documents related to the public review of the Draft EIR.
4. All written comments received on the Draft EIR from public agencies, organizations, and members of the public review period, together with all oral testimony received during duly noticed public hearings.
5. The Final Housing Plan Program EIR, including the Responses to Comments, revisions to the Draft EIR, and all documents incorporated therein by reference.
6. The Mitigation Monitoring and Reporting Program adopted pursuant to Public Resources Code Section 21081.6 and CEQA Guidelines Section 15097.

7. Staff reports, resolutions, presentations, memoranda, correspondence, and other materials prepared for or presented to the Planning Commission and City Council relating to the Housing Plan and the Final EIR.
8. The Housing Plan, General Plan, Housing Element, Municipal Code, and all other planning documents, ordinances, policies, and regulations relied upon in the preparation of the Final EIR or considered during the decision-making process.
9. All reports, studies, memoranda, technical analyses, maps, data, and other documents prepared by or on behalf of the City relating to the environmental review of the Housing Plan, including all documents incorporated into the Final EIR by reference.
10. All written and verbal comments, documentary evidence, and other information presented at public hearings before Planning Commission and City Council regarding the Housing Plan and the Final EIR.
11. All other documents comprising the record of proceedings for the Housing Plan and the Final EIR as defined by Public Resources Code Section 21167.6(e).

2.0 Findings for Certification of the Final EIR

Based on the findings and the entire administrative record, the City of Santa Barbara, as lead agency, certifies that:

1. The Final Housing Plan Program EIR (SCH No. 2022040209) has been completed in compliance with the requirements of the CEQA Statute and Guidelines;
2. The Final EIR was presented to the City Council, and the City Council has reviewed and considered the information contained therein prior to approving the Housing Plan; and
3. The Final EIR reflects the independent judgment and analysis of the City of Santa Barbara as lead agency.

3.0 Findings for Less than Significant Impacts

The Final EIR identifies several environmental issue areas where implementation of the Housing Plan would result in less than significant impacts and therefore, do not require mitigation, as demonstrated in applicable sections of Chapter 4 of the Final EIR. The following environmental issue areas were determined to result in less-than-significant impacts:

- Aesthetics and Visual Resources (Chapter 4.1 of the Final EIR)
- Agriculture and Forestry Resources (Chapter 4.11.1 of the Final EIR)
- Energy (Chapter 4.11.2 of the Final EIR)
- Geology and Soils (Chapter 4.11.3 of the Final EIR)

- Greenhouse Gas Emissions (Chapter 4.5 of the Final EIR)
- Hydrology and Water Quality (Chapter 4.11.4 of the Final EIR)
- Land Use and Planning (Chapter 4.11.5 of the Final EIR)
- Mineral Resources (Chapter 4.11.6 of the Final EIR)
- Population and Housing (Chapter 4.11.7 of the Final EIR)
- Public Services (Chapter 4.11.8 of the Final EIR)
- Recreation (Chapter 4.11.9 of the Final EIR)
- Schools (Chapter 4.8 of the Final EIR)
- Transportation (Chapter 4.9 of the Final EIR)
- Wildfire (Chapter 4.11.10 of the Final EIR)

Finding: The City finds that the evidence presented in the Final EIR supports the conclusion that these impacts would be less than significant.

4.0 Findings for Potentially Significant Impacts

The Final EIR identifies potentially significant environmental impacts associated with implementation of the Housing Plan. As described below, mitigation measures incorporated into the Housing Plan and adopted through the Mitigation Monitoring and Reporting Program (MMRP) avoid or substantially lessen each significant impact to a less-than-significant level.

Pursuant to Public Resources Code Section 21081 and CEQA Guidelines Section 15091, a public agency cannot approve or carry out a project for which an EIR has been certified which identifies one or more significant effects on the environment that would occur if the project is approved or carried out unless the public agency makes one or more of the following findings with respect to each significant impact:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid significant effects on the environment;
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency; or
3. Specific economic, legal, social, technological, or other considerations, make mitigation measures or alternatives identified in the EIR infeasible. The concept of infeasibility also encompasses whether a particular alternative or mitigation measure promotes the project's underlying goals and objectives, and whether an alternative or mitigation measure is impractical or undesirable from a policy standpoint. (See *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957.)

The City has made one or more of these specific findings for each significant impact associated with the Housing Plan. Findings are presented below, along with a presentation of facts in support of the findings. These findings are based on substantial evidence contained in the totality of the administrative record before the City.

4.1 Air Quality

Impacts Determined to Be Less Than Significant

- **Impact AQ-1.** The Housing Plan would not conflict with the 2022 Ozone Plan, and therefore would not promote the release of a cumulatively considerable net increase of a criteria pollutant for which the south central coast air basin is in non-attainment. This impact would be less than significant.
- **Impact AQ-3.** Future development facilitated by the Housing Plan would not create objectionable odors that could affect a substantial number of people or expose future residents to odors that would produce a public nuisance or hazard. This impact would be less than significant.

Finding: The City finds that the evidence presented in Chapter 4.2, *Air Quality*, of the Final EIR supports the conclusion that these impacts would be less than significant. Therefore, no mitigation measures are required for these impacts.

Impacts Determined to Be Less Than Significant with Mitigation Incorporated

- **Impact AQ-2.** Construction associated with future development facilitated by implementation of the Housing Plan could result in temporary emissions of criteria air pollutants and diesel particulate matter that could exceed applicable significance thresholds.

Finding: The City finds that changes or alterations have been incorporated into the Housing Plan that avoid or substantially lessen this significant environmental effect. Mitigation Measure (MM) AQ-1 requires implementation of construction equipment emission control measures through future Municipal Code amendments and project-level review. Evidence presented in Chapter 4.2, *Air Quality*, of the Final EIR supports the conclusion that implementation of MM AQ-1 will reduce

construction emissions to a less-than-significant level. The City adopts MM AQ-1 as part of the MMRP.

4.2 Biological Resources

Impacts Determined to Be Less Than Significant

- **Impact BIO-6.** Development forecasted in accordance with the Housing Plan would not be located within an area delineated on a habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. No impact would occur.

Finding: The City finds that the evidence presented in Chapter 4.3, *Biological Resources*, of the Final EIR supports the conclusion that this impact would be less than significant. Therefore, no mitigation measures are required for this impact.

Impacts Determined to Be Less Than Significant with Mitigation Incorporated

- **Impact BIO-1.** The Housing Plan would accommodate new residential and mixed-use development that may have an adverse effect on habitats used by special-status species. Impacts to candidate, sensitive, and special status species would be less than significant with mitigation.
- **Impact BIO-2.** The Housing Plan could have a substantial adverse effect on riparian habitat, creeks, and sensitive natural communities. Impacts to riparian habitat and sensitive natural communities would be less than significant with mitigation.
- **Impact BIO-3.** Implementation of the Housing Plan would have a potentially substantial adverse effect on Wetlands. Compliance with Federal, State, and City regulations would minimize the direct removal, filling, and hydrological interruption of wetlands. Impacts to State or federally protected wetlands would be less than significant with mitigation.
- **Impact BIO-4.** The Housing Plan would be consistent with federal, state, and City regulations developed to minimize impacts to species movement, wildlife corridors, and nursery sites. Impacts to the movement of fish and wildlife species would be less than significant with mitigation.
- **Impact BIO-5.** Implementation of the Housing Plan could result in the removal of trees and vegetation. Impacts related to conflicts with City Tree Preservation Ordinance and other Tree Protection Guidelines would be less than significant with mitigation.

Finding: The City finds that changes or alterations have been incorporated into the Housing Plan that avoid or substantially lessen this significant environmental effect. The Final EIR requires the following mitigation measures:

- MM BIO-1, requiring development of creek protection regulations applicable to future development adjacent to City creeks.
- MM BIO-2, requiring preparation of regulatory standards and Master Environmental Assessment Guidelines protecting riparian vegetation and habitat.
- MM BIO-3, requiring pre-construction nesting bird surveys, seasonal avoidance measures, and biological monitoring where appropriate.
- MM BIO-4, requiring development of oak woodland protection standards, tree protection measures, and restoration requirements.

Evidence presented in Chapter 4.3, *Biological Resources*, of the Final EIR supports the conclusion that implementation of the above mitigation will reduce biological resource impacts to a less-than-significant level. The City adopts MM BIO-1, MM BIO-2, MM BIO-3, and MM BIO-4 as part of the MMRP.

4.3 Cultural and Tribal Cultural Resources

Impacts Determined to Be Less Than Significant

- **Impact CUL-3.** Ground disturbing activities associated with development forecasted in accordance with the Housing Plan could result in disturbance of human remains. Impacts on human remains would be less than significant.

Finding: The City finds that the evidence presented in Chapter 4.4, *Cultural and Tribal Cultural Resources*, of the Final EIR supports the conclusion that this impact would be less than significant. Therefore, no mitigation measures are required for this impact.

Impacts Determined to Be Less Than Significant with Mitigation Incorporated

- **Impact CUL-1.** The Housing Plan could result in potentially significant impacts to historical resources that are eligible but not yet designated. Impacts would be less than significant with mitigation.
- **Impact CUL-2.** Projected development facilitated by the Housing Plan could impact previously undiscovered archaeological and tribal cultural resources. Impacts on archaeological and tribal cultural resources would be less than significant with mitigation.
- **Impact CUL-4.** Projected development facilitated by the Housing Plan would be subject to adopted City regulatory requirements developed to minimize impacts to potential tribal cultural resources. Compliance with consultation conducted pursuant to the requirements of

AB 52 and the City MEA Guidelines would minimize potential impacts to tribal cultural resources. Impacts on tribal cultural resources would be less than significant with mitigation.

Finding: The City finds that changes or alterations have been incorporated into the Housing Plan that avoid or substantially lessen this significant environmental effect. The Final EIR requires the following mitigation measures:

- MM CUL-1, requiring the identification of potentially significant historic resources during development application review.
- MM CUL-2, requiring Municipal Code amendments to protect archaeological resources.
- MM CUL-3, requiring Municipal Code amendments to protect tribal cultural resources.

Evidence presented in Chapter 4.4, *Cultural and Tribal Cultural Resources*, of the Final EIR supports the conclusion that implementation of the above mitigation will reduce cultural and tribal cultural resource impacts to a less-than-significant level. The City adopts MM CUL-1, MM CUL-2, and MM CUL-3 as part of the MMRP.

4.4 Hazards and Hazardous Materials

Impacts Determined to Be Less Than Significant

- **Impact HAZ-1.** Development facilitated by the Housing Plan could result in the routine transport, use, or disposal of hazardous materials. Compliance with applicable local, State, and federal regulations would minimize the risk of potential exposure of the public to hazardous materials. This impact would be less than significant.
- **Impact HAZ-3.** Development facilitated by the Housing Plan could occur within 0.25 mile of a school. However, compliance with local, State, and federal regulations related to hazardous materials would minimize the risk of hazardous emissions or exposure to acutely hazardous materials, substances, or waste. This impact would be less than significant.
- **Impact HAZ-5.** Compliance with Local, State and federal regulations would minimize safety hazards as residential development would not occur within an Airport Safety Zone or Airport Noise Contour. This impact would be less than significant.
- **Impact HAZ-6.** Development facilitated by the Housing Plan would not result in changes to emergency evacuation routes nor would it substantially increase roadway congestion such that the use of an evacuation route would be hindered. Impacts would be less than significant.
- **Impact HAZ-7.** Development facilitated by the Housing Plan that would occur within High Fire Hazard Areas would be required to comply with local and State regulations and would undergo site-specific development review. This impact would be less than significant.

Finding: The City finds that the evidence presented in Chapter 4.6, *Hazards and Hazardous Materials*, of the Final EIR supports the conclusion that these impacts would be less than significant. Therefore, no mitigation measures are required for these impacts.

Impacts Determined to Be Less Than Significant with Mitigation Incorporated

- **Impact HAZ-2.** Compliance with applicable local, State, and federal regulations would minimize potential hazards from reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. This impact would be less than significant with mitigation.
- **Impact HAZ-4.** Development facilitated by the Housing Plan could result in development on Cortese List sites. Impacts related to development on a Cortese List site would be less than significant impact with mitigation.

Finding: The City finds that changes or alterations have been incorporated into the Housing Plan that avoid or substantially lessen this significant environmental effect. The Final EIR requires the following mitigation measures:

- MM HAZ-1, requiring the preparation of a Phase I/II Environmental Site Assessment for site-specific development.
- MM HAZ-2, requiring Municipal Code amendments to address potential site contamination in the event that contamination is encountered during construction.
- MM HAZ-3, requiring Municipal Code amendments to address the inadvertent discovery of oil and gas wells or infrastructure during construction.

Evidence presented in Chapter 4.6, *Hazards and Hazardous Resources*, of the Final EIR supports the conclusion that implementation of the above mitigation will reduce impacts related to site contamination to a less-than-significant level. The City adopts MM HAZ-1, MM HAZ-2, and MM HAZ-3 as part of the MMRP.

4.5 Noise

Impacts Determined to Be Less Than Significant

- **Impact N-2.** Residential development forecasted under the Housing Plan would generate operational noise typical of the urban environment. However, long-term operational noise from residential sources would be required to comply with the City's noise ordinance. Therefore, permanent operational noise increases would be less than significant.
- **Impact N-5.** Residential development under the Housing Plan would not occur within an Airport Noise Contour. This impact would be less than significant.

Finding: The City finds that the evidence presented in Chapter 4.7, *Noise*, of the Final EIR supports the conclusion that these impacts would be less than significant. Therefore, no mitigation measures are required for these impacts.

Impacts Determined to Be Less Than Significant with Mitigation Incorporated

- **Impact N-1.** Construction of residential development forecasted under the Housing Plan may exceed applicable standards. Mitigation Measure N-1 would mandate implementation of a Construction Noise Management Plan for projects with construction activities that could impact sensitive receivers, minimizing construction noise associated with new residential development and resulting in a less than significant impact.
- **Impact N-3.** Construction of residential development forecasted under the Housing Plan could generate vibration levels that have the potential to damage historic or other old buildings/structures. However, Mitigation Measure N-2 would require planned construction activities to prepare a Vibration Control Plan to reduce/control construction such that vibration levels do not cause damage. This impact would be less than significant with mitigation.
- **Impact N-4.** Residential development forecasted under the Housing Plan could be exposed to outdoor noise levels above the City's land use compatibility standards in addition to the 45 dBA Ldn interior noise standard. However, existing City General Plan policies, in combination with the City's project review and permitting process, would reduce potential impacts of future noise on new housing development. This impact would be less than significant with mitigation.

Finding. The City finds that changes or alterations have been incorporated into the Housing Plan that avoid or substantially lessen this significant environmental effect. The Final EIR requires the following mitigation measures:

- MM N-1, requiring a Construction Noise Management Plan for site-specific development.
- MM N-2, requiring a Vibration Control Plan for site-specific development.
- MM N-3, requiring a Noise Study and site-based attenuation for site-specific development.

Evidence presented in Chapter 4.7, *Noise*, of the Final EIR supports the conclusion that implementation of the above mitigation will reduce noise impacts to a less-than-significant level. The City adopts MM N-1, MM N-2, and MM N-3 as part of the MMRP.

4.6 Utilities and Service Systems

Impacts Determined to Be Less Than Significant

- **Impact UTIL-2.** Projected development forecasted in accordance with the Housing Plan would increase water demand, but would not exceed the projections of the Enhanced Urban Water Management Plan such that a water shortage would occur. Therefore, this impact would be less than significant.
- **Impact UTIL-3.** Projected development forecasted in accordance with the Housing Plan would result in an increase in wastewater generation; however, this increase would not exceed the design capacity of the El Estero Water Resource Center. Therefore, this impact would be less than significant.
- **Impact UTIL-3.** New residential development forecasted in accordance with the Housing Plan would not generate solid waste that would exceed the capacity of local infrastructure or otherwise conflict with federal, State, or local solid waste management and reduction statutes or regulation. This impact would be less than significant.

Finding: The City finds that the evidence presented in Chapter 4.10, *Utilities and Service Systems*, of the Final EIR supports the conclusion that these impacts would be less than significant. Therefore, no mitigation measures are required for these impacts.

Impacts Determined to Be Less Than Significant with Mitigation Incorporated

- **Impact UTIL-1.** Future residential development forecasted in accordance with the Housing Plan may require new utility service infrastructure connections or upsizing of utility mains. Planned housing development is anticipated to occur in developed areas supported by, or adjacent to, existing utility infrastructure. Compliance with applicable City and State regulations, and mitigation measures within this Program EIR would ensure environmental impacts associated with connections to existing utility infrastructure or other utility upgrades would be minimized. Therefore, this impact would be less than significant with mitigation incorporated.

Finding: The City finds that changes or alterations have been incorporated into the Housing Plan that avoid or substantially lessen this significant environmental effect. The Final EIR requires the following mitigation measures:

- AQ-1 Construction Equipment Exhaust Control Measures.
- CUL-1 Historical Resources Protection.
- CUL-2 Archaeological Resources Protection.
- CUL-3. Tribal Cultural Resources Protection.

- HAZ-1 Environmental Site Assessment.
- HAZ-2 Inadvertent Discovery of Contamination.
- HAZ-3 Inadvertent Discovery of Oil or Gas Well.
- N-1 Construction Noise Management Plan
- N-2 Vibration Control Plan.

Evidence presented in Chapter 4.10, *Utilities and Service Systems*, of the Final EIR supports the conclusion that implementation of mitigation measures will reduce impacts related to construction of utilities to a less-than-significant level. The City adopts these mitigation measures as part of the MMRP.

5.0 Findings Regarding Alternatives

The Final EIR evaluated a reasonable range of alternatives meeting most of the Housing Plan objectives. The alternatives evaluated include the No Project Alternative and the Additional Housing Alternative.

5.1 Alternative 1 (No Project Alternative)

Section 15126.6(e) of the CEQA Guidelines requires a “no project” alternative be evaluated in an EIR to allow decision makers to compare the impacts of approving a proposed project with the impacts of not approving that project. *CEQA Guidelines* Section 15126.6(e)(3) specifies that when the project is the revision of an existing land use or regulatory plan, policy, or ongoing operation, the no project alternative would be the continuation of the existing plan conditions. Because the project is a plan to implement programs in the adopted and certified 6th Cycle Housing Element, the No Project Alternative would result in not implementing the programs within the proposed Housing Plan that are necessary to meet the City’s obligations under State housing law, including the requirement to plan for and accommodate the City’s RHNA allocation.

Alternative 1 (No Project) assumes that the Housing Plan programs and associated amendments to the Municipal Code, General Plan, and Local Coastal Program are not adopted or implemented. Existing development standards and policies contained in the City of Santa Barbara General Plan, Zoning Ordinance, and Coastal Land Use Plan would remain in place. Under this alternative, residential development would continue at the existing growth rate based on historical permitting trends but would not implement Housing Plan programs necessary to meet the City’s obligations under state housing law, including planning for the RHNA allocation. Growth was estimated using the City’s 2015–2022 permitting data, which shows an average of 230 housing units permitted annually. For the purposes of this analysis, the No Project Alternative assumes this average rate continues through 2035, resulting in approximately 2,760 new housing units.

Finding: The City finds that the No Project Alternative would not reduce impacts identified in the Final EIR nor satisfy the City's housing obligations under state housing law. Evidence presented in Chapter 6, *Alternatives* of the Final EIR, demonstrates that the No Project Alternative would result in greater impacts on these environmental issue areas compared to the Housing Plan. The No Project Alternative would not implement mitigation measures identified in the Final EIR.

5.2 Alternative 2 (Additional Housing Alternative)

Alternative 2 (Additional Housing) assumes implementation of the Housing Plan with additional measures to increase residential density and accelerate housing production beyond what is analyzed for the proposed project. This alternative provides an analysis of a higher-growth scenario in which housing production exceeds RHNA assumptions. It is intended to illustrate potential environmental effects associated with greater housing capacity. Under this alternative, housing growth would increase by approximately 807 additional units, resulting in a total of 8,808 residential units by 2035. This includes the City's RHNA allocation plus an 11 percent buffer.

The Additional Housing Alternative accounts for expanded implementation of Housing Plan programs and assumes additional policy actions to further increase density such as HE-1 (Facilitate Conversion of Nonresidential Buildings to Housing), HE-7 (Objective Design Standards), HE-10 (Multi-Unit Housing Program), and HE-12 (Prioritize Deed-Restricted Affordable Housing). It also assumes the City would adopt additional measures to facilitate housing development, including requiring minimum residential densities, increasing density ranges in the AUD Program, increasing density in targeted areas, and revising zoning regulations to round up density calculations.

Finding: The City finds that the Additional Housing Alternative would result in similar types of environmental impacts, but potentially greater in magnitude due to increased development intensity and population growth. Evidence presented in Chapter 6, *Alternatives* of the Final EIR, demonstrates that most impacts would be addressed through the same mitigation measures identified for the proposed project; however, increased growth could contribute to potentially significant and unavoidable cumulative impacts related to air quality and greenhouse gas emissions, depending on regional thresholds and attainment assumptions. All mitigation measures applicable to the proposed Housing Plan would also apply to this alternative.

5.3 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires identification of an environmentally superior alternative among the alternatives evaluated in the EIR. In general, the environmentally superior alternative as defined by CEQA should minimize adverse environmental impacts associated with the project or program.

Finding: The City finds that the Housing Plan represents the environmentally superior alternative after implementation of the adopted mitigation measures.

6.0 Findings for Growth Inducing Impacts

Finding: The City finds that the Final EIR adequately evaluates the growth-inducing effects of the Housing Plan pursuant to CEQA Guidelines Section 15126.2(d). The Housing Plan is intended to accommodate anticipated housing needs identified through the Regional Housing Needs Allocation and General Plan planning process. Although implementation of the Housing Plan will facilitate residential development, such growth is planned, anticipated, and consistent with the City's long-range planning objectives.

7.0 Findings for Cumulative Impacts

In compliance with CEQA Guidelines Section 15130, the Final EIR evaluates the cumulative impacts of the Housing Plan. CEQA defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” (CEQA Guidelines Section 15355). Thus, if the effects of the proposed Project, in combination with the effects of past, present, and reasonably foreseeable future related projects within the region will be significant, the proposed Project’s incremental effects must be analyzed to determine if the proposed Project’s contribution to the cumulative impact is cumulatively considerable. (CEQA Guidelines Section 15065(a)(3)). Supportive evidence for the below finding is found in the “Cumulative Effects” sections of each resource topic analysis in the Final EIR.

Finding: The City finds that the Final EIR adequately analyzes cumulative impacts pursuant to CEQA Guidelines Section 15130. The adopted mitigation measures reduce the Housing Plan's contribution to cumulative impacts to a less-than-significant level.

8.0 Findings Regarding Response to Comments

In conformance with Section 15088(a) of the CEQA Guidelines, written responses were prepared to address comments received on the Draft EIR during the 45-day Draft EIR public review period. Refer to Chapter 8, *Response to Comments*, and Appendix G, *Revisions to the Draft EIR*, for specific text changes made to the Draft EIR since its publication and public review. Revisions to the Final EIR provide clarification, additional explanation, updated information, and minor refinements where appropriate, but do not alter the environmental conclusions of the Draft EIR. These changes do not constitute “significant new information” requiring recirculation as defined in Section 15088.5(a) of the CEQA Guidelines.

Finding: The City finds that the Final EIR contains written responses to comments received during the public review period in accordance with CEQA Guidelines Section 15088.

9.0 Mitigation Monitoring and Reporting Program Findings

CEQA requires that an agency adopt a Mitigation Monitoring and Reporting Program (MMRP) prior to approving a project that includes mitigation measures. The purpose of the MMRP is to ensure the adopted mitigation measures for the project are implemented, in accordance with CEQA requirements. The Findings of Fact for the Housing Plan find that changes or alterations have been required in, or incorporated into, the Housing Plan which mitigate or avoid the significant effects on the environment, and that mitigation measures to reduce the significant environmental impacts of the Housing Plan are feasible. The MMRP for the Housing Plan has been prepared in compliance with the requirements of Section 21081.6 of the California Public Resources Code and Sections 15091(d) and 15097 of the CEQA Guidelines.

Finding: The City finds that all potentially significant environmental impacts can be reduced to a less-than-significant level through implementation of the mitigation measures adopted in the MMRP. The City finds that the MMRP has been prepared in accordance with Public Resources Code Section 21081.6 and CEQA Guidelines Section 15097.